



Vernon Communications, LLC

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VIA ECFS

March 5, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554
Attn: Wireline Competition Bureau

**Re: WC Docket No. 10-90
Rural Broadband Experiment Expression of Interest for Price Cap Areas
by Vernon Communications, LLC**

Dear Ms. Dortch:

Vernon Communications, LLC hereby expresses interest in participating in the Commission's rural broadband experiments to provide robust, scalable high-speed broadband to unserved high-cost areas with additional Connect America funding.¹ Vernon Communications is a Competitive ETC wholly owned by ILEC Vernon Telephone Cooperative, Inc. serving rural areas of Wisconsin, and proposes deployment as follows.

Proposed Service Area

Vernon County, Wisconsin Census Tracts.

The experiment will provide broadband service to 619 eligible locations which includes 578 high-cost and 41 extremely high-cost locations. These locations are in unserved high-cost census blocks, within the following census tracts:

55123960100	55123960200	55123960300	55123960400
55123960500	55123960600	55123960700	

Proposed Services

Voice and Broadband services will be provided over a 1 Gigabit fiber-to-the-home transmission network, with broadband speeds of 100 Mbps or greater to be available

¹ See *Technology Transitions et al.*, GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. Jan. 31, 2014).

to all customers. For reliability and to meet any unforeseen future needs of increased broadband capacities, Vernon Commissions proposes to build its network using active fiber to the premise. We do not propose using any passive optical networking (PON). The network will be 100% IP Ethernet and will utilize a 100% converged voice, video and data network. Vernon Communications will utilize its existing soft switch for the IP-voice portion of the service.

Funding

Vernon Communications estimates construction costs to total of \$6,700,000 based on knowledge of the area and it's very difficult terrain. The costs will be refined if and when a formal proposal is submitted. This request from the Connect America Fund is a single-release funding request. The company will fund remaining capital and all ongoing expenses to operate the system, estimated at approximately \$150,000, annually.

Vernon Communications expects service within these unserved census blocks to be offered within 6 months after construction begins.

Vernon Communications, LLC appreciates the opportunity to provide this non-binding expression of interest. Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Rodney D. Olson", written in a cursive style.

Rodney D. Olson, President